

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:

STEPHANIE RANA CARTER AKA
STEPHANIE MADDOX AKA STEPHANIE
CARTER RILEY,

Debtor.

CASE NO. 23-53867-jwc

CHAPTER: 13

JUDGE: JEFFERY W. CAVENDER

OBJECTION TO CONFIRMATION OF PLAN AND MOTION TO DISMISS CASE

COMES NOW U.S. Bank National Association, as Trustee for Residential Asset Securities Corporation, Home Equity Mortgage Asset-Backed Pass-Through Certificates, Series 2006-KS3, (hereinafter known as "Creditor"), a secured creditor holding a Security Deed on real property commonly known as 2675 Harrison Mill Drive, Douglasville, Georgia 30135, and for the reasons stated below, objects to confirmation of the Plan and moves to dismiss this case, as follows:

1. Creditor anticipates filing a pre-petition arrearage claim in the approximate amount of \$9,835.65, more particularly described in the proof of claim once filed. The plan calls for an estimated pre-petition arrearage amount of \$7,000.00 with monthly disbursements on this claim in the amount of \$15.00 and increasing to \$90.00 in January of 2024 and increasing again to \$203.00 in October of 2025. Debtor has underestimated the amount of the arrearage due to the Creditor, and for this reason Creditor objects.

2. Creditor reserves the right to raise the failure of Debtor to have made post-petition payments, if at confirmation that appears to be the case.

WHEREFORE, Creditor prays that the Court deny confirmation of the Plan and moves to dismiss this case. Creditor prays for reasonable attorney's fees and for such other and further relief

as is just and equitable.

/s/ Evan Durkovic

Evan Durkovic, Bar No.: 948332

Attorney for Creditor

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CERTIFICATE OF SERVICE

This is to certify that on this day I electronically filed the foregoing **OBJECTION TO CONFIRMATION OF PLAN AND MOTION TO DISMISS CASE** using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

Bobby Shane Palmer

Nancy J. Whaley

I further certify that on this day I caused a copy of this document to be served via United States First Class Mail, with adequate postage prepaid on the following parties set forth below at the address shown for each.

Stephanie Rana Carter
2675 Harrison Mill Dr
Douglasville, GA 30135

**I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE
AND CORRECT.**

Dated: May 11, 2023

/s/ Evan Durkovic

Evan Durkovic, Bar No.: 948332
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